

MEHLER LAW PLLC

747 Third Avenue ♦ 32nd Floor ♦ New York, NY 10017-2803

Gordon Mehler

Principal

Rebecca Campbell

Diane Ferrone

Sarah Lum

Daniel Rothstein

Harvey Stuart

Of Counsel

Rick Guimond

Ben Stadler

Paralegals

March 13, 2019

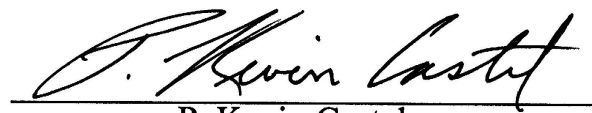
BY ECF

The Honorable P. Kevin Castel
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Application Granted.

SO ORDERED.

Dated: 3/14/2019



P. Kevin Castel
United States District Judge

Re: *United States v. David Bergstein & Keith Wellner*, 16 Cr. 746 (PKC)

Dear Judge Castel:

Our office represents Keith Wellner in the above-referenced securities fraud case. Mr. Wellner is currently released on the following bail conditions: a \$500,000 personal recognizance bond, secured by \$200,000 in securities. Mr. Wellner's travel is currently restricted to the continental United States. In addition, as the Court knows, Mr. Wellner pled guilty in December and testified for the Government in its case against Mr. Bergstein.

We write to request that Mr. Wellner be allowed to China and Thailand from March 26 until April 7 for a series of meetings. The meetings relate to long-standing business matters that Mr. Wellner has been working on since 2008 and is unrelated to the financial services industry. Specifically, Mr. Wellner has been assisting a Chinese biotech company in connection with expanding its business within and outside of mainland China.

In September 2018, December 2018 and January 2019, the Court granted permission for Mr. Wellner to travel to China and surrounding countries. Mr. Wellner has traveled to China approximately six to eight times per year in connection with this and other matters prior to his arrest in November 2016. The Court on ten previous occasions has allowed Mr. Wellner to travel outside the United States and he returned on schedule and without incident.

AUSA Ed Imperatore has consented to this request. Pretrial Services Officer Rena Bolin takes no position, as per office policy. If permitted to travel by the Court, Mr. Wellner would pick up both his current passport, as well as his old expired passport (which has his unexpired valid Chinese Visa in it) from Officer Bolin within two business days of his outbound flight and return his passport within one business day of arriving back in New York (as he has previously done). Additionally, Officer Bolin will be provided a detailed itinerary at least one business day

prior to his departure. We note again that Mr. Wellner has traveled out of the country on ten occasions in 2017, 2018 and 2019 with the Court's approval and returned each time on schedule and without incident.

Thank you for your consideration of this matter.

Sincerely,

/s/ Gordon Mehler by OI

Gordon Mehler